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98N 1038
Executive Director
WENDY PERRON

PSRNYC

PHYSICIANS FOR SOCIAL RESPONSIBILITY/NYC
Disarmament • Environmental Protection • Violence Reduction

2335 '99 JUL 19 P2:00

July 12, 1999

Jane E. Henney, M.D., Commissioner
Food and Drug Administration
5600 Fishers Lane, Room 14-71
Rockville, MD 20852

Re: Docket No. 98N-1038,
"Irradiation in the Production, Processing, and Handling of Food"

Dear Dr. Henney:

We are concerned about the prospect of weakening the labeling requirements for irradiated food. Too few medical studies have been done to show conclusively whether irradiated food is safe to eat. Even the improved e-beam irradiators introduce free radicals, radiolytic products and carcinogens. Further, food irradiation as a solution ignores the fact that factory farms, feed lots and slaughtering facilities are the cause of contamination in meat supplies.

In any case, foods containing ingredients that have been treated by irradiation should be clearly labeled on the principal display panel and accompanied by the radura, the international symbol of irradiated food. If the food is not packaged, this information should be clearly displayed on a poster in plain view.

Like other labels required by federal law, irradiation labels must be truthful. Proposals to use euphemistic phrases like "cold pasteurization" are misleading because pasteurization is an entirely different process of rapid heating and cooling. The terms "treated with radiation" or "treated by irradiation" should be retained because they accurately portray the irradiation process.

Consumers have a right to know how their food has been processed. Please ensure that labeling requirements are strengthened, not weakened.

Sincerely,



Wendy Perron
Executive Director

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Address Correction Requested



Jane Henney, MD
Commissioner

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20852/1730

